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October 25, 2019

VIA ECF

Honorable Brian M. Cogan
 United States District Court
 Eastern District of New York
 225 Cadman Plaza East
 Brooklyn, New York 11201

Re: *Lawson, et al. v. Rubin, et al.* No. 1:17-cv-06404 (BMC) (SMG)
 Request to Make Corrections to Third Amended Complaint

Dear Judge Cogan:

I represent Plaintiffs in the above-referenced matter. I write regarding the Court's October 18, 2019, Order granting Defendants' Motion for Reconsideration and directing Plaintiffs to file their Third Amended Complaint by October 25, 2019 (the "Order") to request permission to make certain corrections to the Third Amended Complaint.

Upon review of our files obtained in discovery which provided further detail regarding certain dates in this action, Plaintiffs determined that the following corrections to the Third Amended Complaint were appropriate in addition to adding Plaintiffs' legal names:

SECOND AMENDED COMPLAINT PARAGRAPHS	CHANGE
¶ 154: " <u>Shortly thereafter, in May or June of 2011</u> , Peterson flew from Los Angeles to New York City to meet with Rubin."	" <u>In or around September 2011</u> , Hassen flew from Los Angeles to New York City to meet with Rubin."
¶ 197: " <u>In 2017</u> , Peterson reached out to Rubin to inform him that a mutual friend of theirs had passed away. "	" <u>In 2015</u> , Hassen reached out to Rubin to inform him that a mutual friend of theirs had passed away."
¶ 532 (h),(i),(j): " <u>In May or June of 2011</u> "	" <u>In or around September 2011</u> "
¶ 30: "Rubin introduced the representatives of Blue Icarus to Plaintiff Speight at the Penthouse <u>in the spring of 2016</u> "	"Rubin introduced the representatives of Blue Icarus to Plaintiff Hopper at the Penthouse <u>in or around November 2016</u> ."

SECOND AMENDED COMPLAINT PARAGRAPHS	CHANGE
¶ 256: <u>“At the Penthouse, Powers presented Speight with a form NDA.”</u>	<u>“Hopper signed an NDA in 2015.”</u>
¶ 257: “Powers requested that Speight sign the NDA <u>before meeting with Rubin for dinner.</u> ”	“Powers requested that Hopper sign the NDA.”
¶ 259: <u>“After signing the NDA,</u> Speight met Shon and Rubin at a restaurant, where there was no further interaction between Speight and Rubin that night.”	“Hopper met Shon and Rubin at a restaurant, where there was no further interaction between Hopper and Rubin that night.”
¶¶ 581, 587, 591, 595: <u>“On November 24, 2016 . . .”</u>	<u>“On or around November 21, 2016 . . .”</u>

Plaintiffs will file their Third Amended Complaint today consistent with the Court’s Order. If the Court grants Plaintiffs’ request after they file their Third Amended Complaint, Plaintiffs respectfully request in the alternative to file a Fourth Amended Complaint with the above corrections.

Counsel for Defendants do not consent to this request.

Respectfully submitted,



Matthew W. Schmidt

cc: Counsel of record (via ECF)